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April 6, 2022

Ashley Armstrong  
Senior Advisor, Office of Energy Efficiency and Renewable Energy  
U.S. Department of Energy  
VIA EMAIL: [expartecommunications@hq.doe.gov](mailto:expartecommunications@hq.doe.gov)

**RE: Ex Parte Communication, Docket EERE-2021-BT-TP-0030, Rheem Sales Company, Inc., Regarding Test Procedures for Central Air Conditioners and Heat Pumps**

Dear Ms. Armstrong:

On March 31, 2022, representatives from Rheem Manufacturing Company, Inc. (Rheem) listed below met with members of the Department of Energy (DOE) to discuss the subject matter. The purpose of this meeting was for Rheem to provide a high-level explanation of our variable speed technology specified in Rheem's petition for waiver that was withdrawn on March 15<sup>th</sup> and ask for clarity from DOE as to where our technology fits relative to the recent NOPR for CAC/HP for communicating vs non communicating classifications.

Below is a summary of the topics discussed:

1. OEM requirements that must be included in the Installation and Operation Instructions to determine classification of coil-only variable speed
2. Certification requirements for variable speed coil only system that is capable of using either a manufacturers proprietary control or a typical 24V thermostat
3. Rheem's technology.

The additional testing burden of communicating versus non communicating classifications for coil-only variable speed systems is significant. For this reason, Rheem recommends that DOE reconsider the merits of the definitions between the two classifications considering that the difference in efficiency ratings between the two TP's has yet to be quantified.

Thank you again for your willingness to discuss this topic during the ex-parte meeting. If you have any questions regarding this submission, please do not hesitate to contact me at (479)414-1603.

Sincerely,

Scott Creamer  
Manager, Compliance and Certification  
Rheem Sales Company, Inc.



INTEGRATED HOME COMFORT



CC: Karen Meyers, Rheem  
Allison Skidd, Rheem  
Derek Brasuell, Rheem  
Lucas Adin, DOE

List of Attendees:

**Rheem** - Scott Creamer, Allison Skidd, Karen Meyers, Derek Brasuell, Sachin Nehete, Jeff Goss, Mark Creason

**Friedrich Air Conditioning** – Lionel Lopez, TJ Wheeler

**DOE** – Ashley Armstrong, Lucas Adin

**Guidehouse** - Detlef Westphalen

